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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

REBA MILLER,

Debtor.

KE HE,

Plaintiff,

-against-

REBA MILLER,

Defendant.

Chapter 7

Case No. 21-10230-MEW

Adv. Pro. No. 21-01123-MEW

**NOTICE OF DEFENDANT’S MOTION TO DISMISS COUNTS 2, 3 and 4 OF THE
AMENDED COMPLAINT**

PLEASE TAKE NOTICE, that on September 9, 2021, at 10:00 a.m., or as soon thereafter as counsel may be heard, Defendant, Reba Miller (hereinafter, “Miller”) in the above-captioned adversary proceeding, by and through her undersigned counsel, Kasen & Kasen, P.C., shall move before the Honorable Michael E. Wiles, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green,

Court Room 617, New York, New York 10004-1408 (or virtually due to Covid-19 protocols), seeking entry of an order dismissing counts 2, 3 and 4 of the Plaintiff, Ke He's, amended complaint with prejudice, and for such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that responses and objections, if any, to the Motion and the relief requested therein, must be made in writing and shall state with particularity the grounds therefor, and shall be filed with the Clerk of the Bankruptcy Court by electronic means (with a copy to Chambers), and served upon and received by counsel for the Defendant, Michael Kasen, Esq., Kasen & Kasen P.C., 115 Broadway, 5th Floor, New York, New York 10006, and the United States Trustee's Office, 201 Varick Street, Suite 10006, New York, New York 10014, so as to be actually received no later than seven days prior to the Hearing Date.

Dated: New York, New York
August 12, 2021

KASEN & KASEN, P.C.

By: /s/ Michael J. Kasen
Michael J. Kasen, Esq.
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